

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Global Relief Foundation**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

Global Relief Foundation is a Specially Designated Global Terrorist Organization

2. On December 14, 2001, the U.S. Treasury's Office of Foreign Asset Control (OFAC) froze Global Relief Foundation's (GRF) assets based on the determination that GRF has connections to, has provided support for, and has provided assistance to Osama bin Laden, the al Qaeda Network, and other known terrorist groups. GRF was named in an October 2002 U.S. Executive Order as a Specially Designated Global Terrorist (SDGT) for allegedly providing material support to al Qaeda, including "ammunition" for would-be "holy warriors."

3. Since GRF's assets were blocked, the government has gathered classified information about GRF which has reaffirmed that the organization works closely with terrorist organizations:

In addition to this unclassified evidence, the classified material gathered since the date of the blocking has greatly amplified OFAC's [Office of Foreign Asset Control] belief that GRF may have acted in concert with, and in support of, terrorists and terrorist entities.

Global Relief Foundation Has Connections with Taibah International

4. GRF operated in Bosnia-Herzegovina (BiH) under the aegis of Taibah International, a humanitarian organization which has provided financial and material support to al Qaeda.

5. U.S. investigations in BiH and the U.S. show close relations between the now-prohibited organizations GRF and Taibah. Taibah employee Mohammed El-Nagmy concurrently served as GRF's representative. On February 21, 2002, the FBI interrogated Taibah employee Mustafa Ait-Idir who admitted Taibah was the organization representing GRF's interests in BiH after the BiH authorities had prohibited GRF's activities there. Mustafa Ait-Idir also said Taibah employee Mohammed Ibrahim was GRF's assistant and directly responsible for GRF's concerns in the Sarajevo area.

6. When Abdulrahman al-Amoudi, Taibah's Vice-President, was detained in London, his palm pilot contained the contact information for Mohamed Chehade, a former top GRF official in the U.S.

Global Relief Foundation Has Received Monetary Transfers and Donations from People and Organizations Connected with al Qaeda and Other Terrorist Organizations

7. In the year 2000 Khalil Zaidan's Portland-based company Rampart Technologies donated \$8,500 to GRF. Zaidan has a history of involvement in fundamentalist terror activity. Phone records show his company has been called by the Al-Kifah Refugee Center, which until its closure in 1994, was the U.S. branch of Makhtab-e-Khademat (the "Mujahideen Services Office"), the direct predecessor of Al-Qaeda. Zaidan was subpoenaed to appear at al Qaeda terrorist Wadih el-Hage's embassy bombing trial after authorities found Zaidan's name in El-Hage's address book submitted

as evidence in the trial. The address book contained names and addresses of El-Hage's international contacts, including many al Qaeda activists.

8. The following transaction receipts for money sent to GRF CEO Nabil Sayadi were seized from a company owned by Muhammed Galeb Kalaje Zouaydi, a high-level al Qaeda financier and brother-in-law of Osama bin Laden:

A wire transfer receipt by Telex through National Commercial Bank in Saudi Arabia for the amount of \$2000 sent from Muhammed Galeb Kalaje to Nabil Sayadi on June 2, 1996.

A wire transfer receipt by Telex through National Commercial Bank in Saudi Arabia for the amount of 128,860 riyals sent from Khaldon Katmawi to GRF's Belgium branch Foundation Secours Mondial on October 3, 1997.

A wire transfer receipt by Telex through National Commercial Bank in Saudi Arabia for the amount of \$1,200 sent from Mazin Nahas to Nabil Sayadi on April 19, 1998.

A wire transfer receipt for a transaction through Al Rahji Banking & Investment Corporation in Riyadh for the amount of 498,344 riyals to Nabil Sayadi.

The telephone number provided in the transactions is the same of Zouaydi's former company Mushayt for Trading in Saudi Arabia.

9. Imad Tarabishy, a Florida surgeon who is on both the board of trustees and board of advisors of the North American Islamic Trust (NAIT) gave at least \$796,600 between 1996 and 2000 to the Benevolence International Foundation (BIF) and the Global Relief Foundation. NAIT had strong ties to the Quranic Literacy Institute (QLI). FBI Agent Robert Wright, in a sworn affidavit, confirmed that QLI was used in the early 1990s by a group of Arab-Americans as a corporate entity to launder funds for the Hamas terrorist organization.

10. IANA transferred \$21,519 to the Global Relief Foundation.

11. Rabih Haddad, a co-founder of the GRF, was deported to Lebanon in July 2003 after being arrested and held by federal agents during a raid on GRF. Haddad was also a fundraiser for the Ann Arbor CAIR (The Council on American-Islamic Relations, Inc.) chapter. Following the September 11 attacks, CAIR had a link on its web site for persons to donate through the GRF. After federal agents shut down GRF in December 2001, CAIR removed the link from its web site.

GRF Disseminates al Qaeda Propaganda

12. GRF extolled Osama bin Laden's mentor and founder of al Qaeda, Abdullah Azzam. In a series of tapes and books offered for sale, GRF made available media about Azzam's ideology—an ideology shared by Osama bin Laden. The government elucidated in filed court documents:

GRF also offered for sale the "heritage of video tapes and books" of Sheikh Abdallah Azzam. Azzam—Usama bin Laden's mentor—is regarded as the historical leader of Hamas and the founder and leader of Makhtab al-Khidemat (MAK), both organizations designated as terrorists under Executive Order 13224, Ex. C. Jane's Intelligence Review reported that Azzam as bin Laden's superior in MAK (the precursor to Al Qaeda), shaped bin Laden's worldview and worked together with bin Laden until Azzam was assassinated in September 1989. Despite Azzam's terrorist background, GRF has enthusiastically promoted Azzam's materials to the public:

"His [Azzam's] theology is a sea, his words are jewels, and his thoughts are a light for those who are holding the smoldering embers. He lived the Jihad experiences of the 20th century in Afghanistan...and Palestine, and produced a new theory for saving the [Islamic] Nation from disgrace, shame, weakness, and submission to others."

The titles GRF offered included, for example, "The International Conspiracy Against Jihad," "A Series on the International Conspiracy," "In the Heat of Battle, the Editorials of Sheikh Abdallah Azzam's Al-Jihad Magazine," and "The Jihad in its Present Stage." GRF said it was "glad" to offer this "informational and propagational materials," and that requests for such information should be sent to GRF.

Global Relief Foundation Was Inspected by the BiH Financial Police and Failed to Comply with Financial and Accounting Requirements

13. On January 11, 2002, the Prime Minister of the Federation of BiH submitted an official document to the Federation Ministry of Finance requesting the Financial Police conduct an inspection of the operations of the humanitarian organizations listed in the request which included GRF. On March 7, 2002, an Information Report regarding the investigation of GRF was issued and revealed that GRF had violated the Federation of Bosnia and Herzegovina Accounting Code, Financial Code, and the Code of the Accounting Principles and Accounting Standards by failing to keep its master book, daily log, analytical records, cash book, other auxiliary books, annual or semi-annual accounting statements, and financial reports (Balance Sheets and Income Statements) for the period between 1997 and 2001. GRF also failed to record the balance of funds and obligations according to the source of funds with the actual balance, which is determined by inventory in violation of the Accounting Code, nor did it possess any documentation pertaining to the acquisition and allocation of funds as required by the Financial Code. On grounds of the above, a Conclusion number was issued on March 19, 2002, which required that GRF organize its books and draft accounting statements and financial reports for the aforementioned fiscal years. GRF failed to comply with the request by the deadline, and a Decision number was issued on April 3, 2002, which temporarily prevented the organization from managing the funds in the non-residential account 7160-164 held by the bank Commerc banka, d.d. Sarajevo located in Sarajevo, Dzidzikovac. The aforementioned Decision remains in effect.

GRF Has Other Terrorist Connections

14. In early 2000, GRF appeared at an address in Sarajevo in a building used by the citizens association Al Furken. Al Furken is connected with suspicious activities and extremist behavior including involvement in financing the Active Islamic Youth, a sub-organization of the Saudi High Committee.